

1 **Jon S. Musial**, (Arizona Bar No. 012828)

2 **LAW OFFICE OF JON S. MUSIAL**

3 8230 East Gray Road

4 Scottsdale, Arizona 85260

5 Telephone: (602) 951-0669

6 Facsimile: (602) 922-0653

7 Internet: jsmusial@worldnet.att.net

8 Counsel for Cinergy Corp. and its subsidiaries

9 (Union Light Heat & Power Company, Cincinnati

10 Gas & Electric Company, PSI Energy, Inc.);

11 FirstEnergy Corp. and its subsidiaries (Pennsylvania

12 Power Company, Cleveland Electric Illuminating

13 Company, The Toledo Edison Co. and Ohio Edison

14 Company); and American Electric Power and its

15 Subsidiaries (Columbus Southern Power and Ohio Power)

FILED

OCT 20 4 01 PM '98

KEY

EN

U.S.

NY

DIS

CA

11 **IN THE UNITED STATES BANKRUPTCY COURT**

12 **FOR THE DISTRICT OF ARIZONA**

13 In re:

Chapter 11 Proceedings

14 BCE WEST, L.P., et al.,

Case Nos. 98-12547-PHX-CGC

Through 98-12570-PHX-CGC

15 Debtors.

(jointly administered)

16 EID: 38-3196719

17 **VERIFIED STATEMENT OF JON S.**
18 **MUSIAL UNDER BANKRUPTCY RULE**
19 **2019**

20
21 The Law Office of Jon s. Musial hereby files a verified Statement regarding
22 representation of creditors and parties in interest with respect to the above captioned cases,
23 pursuant to Bankruptcy Rule 2019(a):

- 24 1. The parties represented by the Law Office of Jon S. Musial in the above
25 referenced jointly administered Chapter 11 cases are as follows, including their
26 names, addresses, the nature and amount of their claims and the time of
acquisition thereof:

1
2 a) Cinergy Corp and its subsidiaries (Union Light Heat & Power
3 Company, Cincinnati Gas & Electric Company, PSI Energy, Inc.) c/o
4 Cinergy Corp., Legal Department, 139 East Fourth Street, P.O. Box
5 960, Cincinnati, OH 45201;

6 These parties are utility service providers in the states of Indiana,
7 Kentucky and Ohio with claims for unpaid pre-petition utility
8 service (and contingent claims for post-petition service), the nature
9 and amount of which are currently unknown due to, in part,
10 litigation under 11 U.S.C. §366. Cinergy Corp. is seeking a
11 deposit of \$47,465.00 for at least 19 stores pursuant to §366.

12 b) FirstEnergy Corp. and its subsidiaries (Pennsylvania Power Company,
13 Cleveland Electric Illuminating Company, The Toledo Edison Co. and
14 Ohio Edison Company) c/o Legal Department, 76 S. Main Street,
15 Akron, OH 44308,

16 These parties are utility service providers in the states of Ohio and
17 Pennsylvania with claims for unpaid pre-petition utility service
18 (and contingent claims for post-petition service), the nature and
19 amount of which are currently unknown due to, in part, litigation
20 under 11 U.S.C. §366. FirstEnergy Corp. is seeking a deposit of
21 \$71,234.50 for at least 26 stores pursuant to §366.

22 c) American Electric Power and its Subsidiaries (Columbus Southern
23 Power and Ohio Power) c/o P.O. Box 2021, Roanoke, VA 24022,

24 These parties are utility service providers in the states of, inter alia,
25 Ohio and Virginia with claims for unpaid pre-petition utility
26 service (and contingent claims for post-petition service), the nature
and amount of which are currently unknown due to, in part,
litigation under 11 U.S.C. §366. American Electric Power is

1
2 seeking a deposit of \$19,175.71 for at least 9 stores pursuant to
3 §366.

4 2. The Law Office of Jon S. Musial has disclosed to each entity referenced above
5 the identity and nature of the representation of all twelve clients in the BCE
6 West, L.P., et al., bankruptcy cases, and all twelve entities have consented to
7 such representation.

8 3. I certify and verify that the above statements are true and accurate to the best
9 of my knowledge, information and belief.

10 RESPECTFULLY SUBMITTED this 20th day of October, 1998.

11 LAW OFFICE OF JON S. MUSIAL

12
13
14 

15 Jon S. Musial
16 8230 East Gray Road
17 Scottsdale, Arizona 85260
18 Telephone: (602) 951-0669
19 Facsimile: (602) 922-0653
20 Internet: jsmusial@worldnet.att.net
21 Counsel for Cincergy Corp. and its subsidiaries
22 (Union Light Heat & Power Company,
23 Cincinnati Gas & Electric Company, PSI
24 Energy, Inc.); FirstEnergy Corp. and its
25 subsidiaries (Pennsylvania Power Company,
26 Cleveland Electric Illuminating Company,
The Toledo Edison Co. and Ohio Edison
Company); and American Electric Power
and its subsidiaries (Columbus Southern
Power and Ohio Power)

1
2 I certify that a true and accurate copy of
3 the foregoing was served via facsimile and
4 by regular first class mail this 20th day of
October, 1998 to:

5 H. Rey Stroube, III
6 S. Margie Venus
7 AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.
1900 Pennzoil Place - South Tower
711 Louisiana
Houston, Texas 77002

8 and

9 Randolph J. Haines
10 LEWIS AND ROCA LLP
40 North Central Avenue
Phoenix, Arizona 85004-4429

11
12 
13
14
15
16
17
18
19
20
21
22
23
24
25
26